

REMARKS

The office action and the references cited therein have been carefully considered together with the present application and amendments have been made to the specification and claims in an effort to place the application in condition for allowance.

The examiner has objected to the specification for failure to provide a Background of the Invention title. Accordingly, an amendment has been made to line 3 of page 1 to add this title. Applicants note that MPEP § 608.01(c) discusses this and indicates that the Background of the Invention *ordinarily* comprises two parts, which are then described in more detail. However, this is not a mandatory requirement and applicants decline to alter the application further. Moreover, applicants and counsel understand the duty of candor disclosure requirements and choose to supply relevant prior art in an Information Disclosure Statement rather than in the specification itself. Applicants' preferences in this regard are no different than tens of thousands of other patents that have been issued by the U.S. PTO.

The examiner has objected to claims 7, 9, 23-25, 30-32 and 37 because of stated informalities, most if not all of which relate to lack of sufficient antecedent basis. Applicants have reviewed these objections and have made amendments to each of the claims to overcome these objections.

The examiner has rejected claims 1, 2, 5, 9, 13-14, 17-18, 20-21 and 23 as either being anticipated under 35 U.S.C. 102 or as being obvious under 35 U.S.C. 103(a) based on Hamzy.

Before addressing the Hamzy reference, it is noted that many of the claims have been rejected based at least in part upon the Pineau and Moyer applications. The claims that have been rejected based upon these applications include claims 3-4, 6, 7, 8, 10-12 and 24-37,. Applicants have filed the enclosed § 131 Declaration of the undersigned which establishes that the present invention was completed prior to the filing dates of both the Moyer and Pineau applications, which removes them as prior art to the present application. That being the case, applicants respectfully traverse the rejections of these claims.

With regard to the rejection of claims based solely upon Hamzy, applicants respectfully request reconsideration and allowance of the claims as amended. More particularly, with regard to amended claim 1, it is strongly believed that neither Hamzy nor any of the other prior art references of record anticipate, teach or suggest a system for printing target data from a web application used through a browser of a client computer that is operatively connected to a web server providing the web application, comprising, *inter alia*, a personal imaging repository for storing data associated with a user profile or the element wherein the web application content directs the browser to said print destination server and transfers data to said personal imaging repository responsive to user print selection. Hamzy does not anticipate, teach or suggest these elements and the examiner's prior reliance on Pineau and/or Moyer is misplaced because these references have been removed as prior art to the present invention.

The examiner also admits that Hamzy does not explicitly teach a web server for providing the web application but does have a proxy server for providing the web application and that it would have been obvious to a person of ordinary skill that Hamzy implicitly discloses a proxy server that is equivalent to applicants' claimed web server. Applicants dispute this equivalency. Hamzy's own specification admits that a web server is different from the proxy server. This is described at column 4, lines 39-53 in connection with Fig. 2 (which shows not one "proxy server" but two of them) where it is stated "client 101 using a web browser issues and HTTP GET or POST request for the web page from the web server at a URL, e.g., www.ibm.com. A URL identifies the network path to a server by use of a special syntax to define the network connection. This request is handled by a proxy server 103 within an intranet or the server of an intranet service provider which forwards the request to the web server whose URL is www.ibm.com." The differences between the proxy server and the web server are clearly described by Hamzy and it is mere speculation and attempted hindsight reconstruction to make the Hamzy reference meet the language of the claims.

Claim 18 has been amended to find a method for printing target data as claimed which comprises, *inter alia*, the step of sending a URL request for printing

the target data and transferring the target data to a personal imaging repository responsive to user print selection on said web application content. Hamzy simply does not anticipate, teach or suggest the method as claimed because it does not have a sending step as claimed.

With regard to claim 23, it should be allowed for the reason that Hamzy does not anticipate, teach or suggest the web server as argued above.

Claims 24, 25, 28 and 37 are not taught or suggested by Hamzy for the reason that these claims include, *inter alia*, language relating to storing of imaging data to a personal imaging repository which Hamzy simply does not do.

The dependent claims not specifically addressed above necessarily include the features of the claims from which they depend in addition to reciting other features and/or functionality not found in those claims and for those reasons, are believed to be in condition for allowance.

Reconsideration and allowance of all claims presently appearing in the application is respectfully requested.

Respectfully submitted,

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